

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

BODUM USA, INC.,

Plaintiff,

v.

LA CAFETIÈRE, INC.,

Defendant.

No. 07 C 6302

Judge: Matthew F. Kennelly

**MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff Bodum USA, Inc. (“Bodum”) by its respective counsel, move the Court to enter a protective order (the “Protective Order”) in this matter. In support of this motion, Bodum states as follows:

1. In the course of discovery in this matter, the parties plan on exchanging confidential and proprietary business information. Specifically, the parties anticipate that the follow categories of confidential information will be exchanged: (1) proprietary business and financial information, including, but not limited to, sales figures, internal analysis of sales figures, future sales projections, profit and loss statements, and other non-public financial reports; (2) internal marketing material, including, but not limited to, documents reflecting expenditures associated with marketing efforts; (3) prospective product design materials, including, but not limited to, documents reflecting internal research and development efforts to create products that have not been made available to the public; and (4) trade secrets.

2. Entry of the Protective Order will assist to expedite the flow of discovery material, facilitate the prompt resolution of disputes over confidentiality, protect material entitled to be kept confidential and ensure that protection is afforded only to material so entitled. Such

confidentiality is necessary to protect the parties' legitimate and proprietary business interests, as the information designated to be confidential bears directly upon the their ability to compete in the marketplace.

3. While Bodum and Defendant La Cafetière, Inc. engaged in negotiations regarding the terms of a protective order, the parties were unable to reach a final agreement.

4. Accordingly, Bodum's proposed Protective Order is attached hereto as Exhibit A.

WHEREFORE, Bodum requests that the Court grant its Motion for Entry of Protective Order, and enter the Protective Order in this matter in the form attached as Exhibit A.

Dated: August 5, 2008

Respectfully submitted,

BODUM USA, INC.,

By: /s/Jared C. Jodrey  
One of Its Attorneys

David E. Bennett, Esq.  
Chad A. Schiefelbein, Esq.  
Jared C. Jodrey, Esq.  
Vedder Price P.C.  
222 North LaSalle Street, Suite 2600  
Chicago, IL 60601  
(312) 609-7500